

Sheehan & Associates, P.C.

505 Northern Blvd Ste 311 tel. 516.303.0552 fax 516.234.7800
Great Neck NY 11021-5101 spencer@spencersheehan.com

January 13, 2020

District Judge Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: 1:19-cv-04861-ENV-SMG
Weber-Lugo et al v. Aldi Inc.

Dear District Judge Vitaliano:

This office represents the plaintiff. On Monday, November 18, 2019, plaintiff filed a waiver of service setting defendant's time to answer or respond to the complaint as Friday, January 17, 2020.

In accordance with your Honor's Individual Rules of Practice in Civil Cases, plaintiff, jointly and with consent of defendant, requests an extension of thirty (30) days for defendant to answer or respond to the complaint. There have been no previous requests for adjournment or extension of the conference date. No prior request was granted or denied. Defendant consents to and joins plaintiff in the present request. The reason for this request is because the parties are engaging in substantive, positive discussions regarding how they will proceed, such as a motion to dismiss the complaint or answer by defendant, an amended complaint by plaintiff or a resolution of the issues. This request is submitted at least 48 hours prior to the original compliance date. This requested extension does not affect any other scheduled dates. Thank you.

Respectfully submitted,

/s/Spencer Sheehan
Spencer Sheehan

Certificate of Service

I certify that on January 13, 2020, I served or emailed the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email
Defendant's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Plaintiff's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan
Spencer Sheehan